Case 2:20-cv-00078-JRG	Document 67-2	Filed 11/25/20	Page 1 of 4 PageID #:	1311
	EXH	IBIT B		

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

CELLULAR COMMUNICATIONS	§	
EQUIPMENT LLC,	§	
	§	
Plaintiff,	§	C.A. No. 2:20-cv-00078-JRG
	§	
v.	§	JURY TRIAL DEMANDED
	§	
HMD GLOBAL OY,	§	
	§	
Defendant.	§	

EXHIBIT B

DEFENDANT'S CLAIM CONSTRUCTION CHART

U.S. Patent No. 7,218,923

Claim Term	Defendant's Proposed Construction	Supporting Evidence
"a message of the messages" (claim 1)	indefinite	'923 Patent: Abstract, 1:31-50, 1:59-60, 1:60-63, 1:65-2:3, 2:6-22, 2:23-31, 2:32-53, 2:54-57, 3:7-29, 3:57-4:10, 4:28-45, 4:46-5:9, 5:20-42, 5:49-6:5, 6:6-11, 6:12-19, 6:20-67, 7:1-12, 7:13-55, 8:20-47, 8:57-9:7, 9:10-55, 10:58-11:5, 12:22-50, Figs. 1-10. CCE_HMD_000047-51, 73-87, 88-92, 101-126, 128-136, 143-162, 165-173, 179-199, 205-208, 210.

		Memorandum Opinion and Order, Case No. 13-507, Docket No. 363. IPR2014-01133, Paper No. 1 and exhibits attached thereto; IPR2014-01133, Paper No. 9; IPR2014-01133, Paper No. 27 and exhibits attached thereto; IPR2014-01133, Paper No. 27 and exhibits attached thereto; IPR2014-01133, Paper No. 47; IPR2014-01133, Paper No. 48. IPR2015-01927, Paper No. 1 and exhibits attached thereto; IPR2015-01927, Paper No. 7; IPR2015-01927, Paper No. 8. Any additional evidence relied on by CCE or its expert.
"the messages" (claim 8)	indefinite	'923 Patent: Abstract, 1:31-50, 1:59-60, 1:60-63, 1:65-2:3, 2:6-22, 2:23-31, 2:32-53, 2:54-57, 3:7-29, 3:57-4:10, 4:28-45, 4:46-5:9, 5:20-42, 5:49-6:5, 6:6-11, 6:12-19, 6:20-67, 7:1-12, 7:13-55, 8:20-47, 8:57-9:7, 9:10-55, 10:58-11:5, 12:22-50, Figs. 1-10. CCE_HMD_000047-51, 73-87, 88-92, 101-126, 128-136, 143-162, 165-173, 179-199, 205-208, 210. Memorandum Opinion and Order, Case No. 13-507, Docket No. 363. IPR2014-01133, Paper No. 1 and exhibits attached thereto; IPR2014-01133, Paper No. 9; IPR2014-01133, Paper No. 10;

IPR2014-01133, Paper No. 27 and exhibits attached thereto; IPR2014-01133, Paper No. 47; IPR2014-01133, Paper No. 48.
IPR2015-01927, Paper No. 1 and exhibits attached thereto; IPR2015-01927, Paper No. 7; IPR2015-01927, Paper No. 8.
Any additional evidence relied on by CCE or its expert.